

ASSESSMENT PLAN
BUILDING 123 CLUSTER D&D

ASSESSMENT ID NUMBER: 97-002-CPEI

DATE: 8/5/97

ASSESSMENT DRIVER: DOE-RFFO AMEC Environmental Readiness Evaluation Procedure

ASSESSMENT SCOPE: The Building 123 Cluster (Buildings 123, 113, 114 and 123S) is being readied for deactivation, asbestos abatement and decommissioning. Building 123 is the largest building in the cluster and operated as the site bioassay laboratory. Associated structures include Building 113, a medical records storage facility (originally a guard shack); Building 114, a small outdoor shelter; and Building 123S, a metal storage unit for containerized waste. A joint K-H/RMRS team will perform a pre-assessment of the project's readiness to start the deactivation, asbestos abatement and decommissioning phases. Once the pre-start findings identified in the pre-assessment are brought to closure, the final assessments leading to DOE-RFFO approval to start can be completed. Per the RFFO-AMEC procedure, this Project is a category 3 project and the graded approach will be applied.

This assessment will review:

- project scope
- procedures/contracts
- hazards analyses:
- authorization bases
- regulatory requirements
- training
- project health and safety

ASSESSMENT TYPE: Programmatic

FREQUENCY: Once per each phase of the project. The assessment of each phase will be graded to take credit for areas unchanged by previous phase assessments (ie., authorization basis will be assessed only once if the AB remains unchanged for all project phases).

ASSESSMENT TECHNIQUES: A joint K-H/RMRS team will be utilized for the pre-assessment. An evaluation will be made at the conclusion of the pre-assessment to determine if the joint team is needed for all future phases of this project. Area specific subject matter experts (SMEs) will supplement the assessment team as needed. The assessment will be accomplished by a combination of interviews, document reviews and field visits.

The K-H/RMRS assessment team members are as follows:

- Ken Baier--RMRS (E2)
- Jill Bruse--K-H
- Vern Guthrie--RMRS
- Ted Hopkins--RMRS
- Ken Jenkins--RMRS
- Kelly Trice--RMRS
- Jack Zimmer--K-H

CRITERIA: The RFFO AMEC procedure identifies both the minimum core elements and optional additional elements of the assessment to be performed. The team will evaluate the elements for applicability and grading, and will develop the criteria for the assessment.

DELIVERABLE: A pre-assessment report will be issued by August 7, 1997. Final assessment reports for each phase of the project will be issued prior to the start of the respective phase.

ADMIN RECORD

B123-A-000140

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COMPANY

INTEROFFICE MEMORANDUM

DATE: August 7, 1997

TO: Kent Dorr, K-H Project Management, Bldg. T130F, X6034
Doug Steffen, RMRS E/C/D Project Management, Bldg. T130F, X2164

FROM: Jack Zimmer, Closure Project Engineering & Integration, Bldg. 130, X4975

SUBJECT: PRE-ASSESSMENT FOR READINESS OF THE BUILDING 123
DECONTAMINATION AND DECONTAMINATION (D&D) PROJECT

REF: J. J. Zimmer ltr, JJZ-045-97, to Kent Dorr and Doug Steffen, Issues
Potentially Impacting the 123 Decontamination and Decommissioning
Project, July 28, 1997

PURPOSE

The referenced letter provided notification that a pre-assessment of the Project was being performed, the team members and potential issues. This memorandum documents the pre-assessment and the pre-start findings.

DISCUSSION

During the period of July 23, 1997 to August 7, 1997 the K-H/RMRS pre-assessment team conducted a management review of the readiness of the Building 123 D&D Project to initiate deactivation, asbestos abatement and D&D. The DOE-RFFO Environmental Readiness Evaluation Procedure was used as the basis for the pre-assessment. The attached Pre-assessment Checklist summarizes the areas evaluated and the results of the review.

PRE-START FINDINGS

The following is a list of the pre-start findings for the deactivation phase of the Project. All findings must be completed before the deactivation phase can be initiated.

1. The Proposed Action Memorandum (PAM) for the Building 123 Decommissioning must be approved by DOE-RFFO and CDPHE.
2. An auditable safety analysis (ASA) or facility hazard categorization, as appropriate, and a health and safety plan (HASP) must be issued.
3. An integrated work control package (IWCP) for deactivation must be issued.
4. Limited field interviews must be satisfactorily conducted to complete the ERE and DOE-RFFO approval to start work must be issued.
5. Prior to removing any waste lines during the deactivation phase the Project RCRA Closure must be approved and issued

Limited, graded ERE assessments with DOE-RFFO review and approval must be performed prior to the start of work for both the asbestos abatement and decommissioning phases of the Project. Any pre-start findings would have to be resolved prior to DOE-RFFO approval.

RESPONSE REQUIREMENTS

As pre-start findings are completed, report status to Closure Projects Engineering and Integration such that the ERE assessment can be completed and DOE-RFFO approval to start work can be obtained.

Attachment:
As Stated

cc:

K. Baier
J. Bruse
S. Crowe
B. Evans
V. Guthrie
T. Hedhal
T. Hopkins

F. Hughes
K. Jenkins
T. Overlid
A. Parker
K. Trice
J. Zimmer
File

AMEC ENVIRONMENTAL READINESS EVALUATION PROCEDURE**Core Element Assessment**

8/1/97

RMRS Authorization Basis - Ken Baier

Minimum Core Element Requirement: *Facility safety documentation is in place that describes the "safety envelope" of the project. The safety documentation should characterize the hazards/risks associated with the project and should identify mitigative measures that protect workers and the public from those hazards/risks. Safety systems and systems essential to worker and public safety are defined and a system to maintain control over the project. (Ken Jenkins and Ken Baier)*

DOD-EM-STD-5502-94, *Hazard Baseline Documentation*, requires safety and health identification and control documentation appropriate to the categorization, classification, and life cycle stage be developed and maintained for each environmental management (EM) facility. This requires an assessment of the facility hazards and a determination of radiological and chemical quantities. Based upon the amount of radiological and chemical materials, the facility can be categorized according to Figure 1 in DOE-EM-STD-5502-94. The categorization of the facility determines the safety documentation required to meet the requirements of the standard. Currently, based upon the Facility Safety Analysis (FSA) developed for Building 123, the facility is categorized as a non-nuclear moderate hazard facility. The categorization was based upon the quantities of chemicals in the facility (specifically hydrochloric acid, hydrofluoric acid, and nitric acid) exceeding 40 CFR 302.4, Table 302.4 Reportable Quantity (RQ) and 40 CFR 355 Threshold Planning Quantity (TPQ) levels. Based upon this categorization an auditable safety analysis document and Health and Safety Plan (HASP) were the required documentation. The FSA developed as part of the Site Safety Analysis Report (Site SAR) met the requirement of an auditable safety analysis document.

The new mission, decontamination and decommissioning (D&D), of Building 123 requires a hazard identification and re-categorization (if appropriate) of the facility. If the facility is categorized as a non-nuclear moderate hazard facility again, the FSA could be updated to reflect the new mission and any new hazards from this mission or a safety analysis document could be developed to replace the FSA and addressing the hazards due to D&D. If the facility is categorized as an industrial facility either a HASP or compliance to applicable Occupational Safety and Health Act (OSHA) standards is required. In this instance, documentation should be provided indicating the method(s) used to re-categorize the facility and that the FSA is no longer applicable.

AMEC ENVIRONMENTAL READINESS EVALUATION PROCEDURE**Core Element Assessment**

8/1/97

RMRS Authorization Basis - Ken Baier

Minimum Core Element Requirement: *A systematic review of the facility's conformance to applicable DOE Orders has been performed, any nonconformances have been identified, and schedules for gaining compliance have been justified in writing and formally approved, or waivers granted. (Jack Zimmer, Ken Baier, Ken Jenkins, Ted Hopkins)*

The applicable DOE regulatory standard to determine the required authorization basis documentation for Building 123 is DOE limited standard DOE-EM-STD-5502-94, *Hazard Baseline Documentation*. This standard applies to the classification, development, review and approval of hazard identification and control documentation for environmental management (EM) facilities. All life cycle stages of an EM facility are applicable for this standard, including decommissioning and decontamination, removal, disposal, and remediation. An assessment of the hazardous and radiological materials in the building was performed to facilitate categorization of Building 123 in accordance with this standard. The facility was categorized as an *Industrial Facility* with hazardous waste activities, therefore the required safety documentation is a site-specific HASP. A HASP for the Building 123 D&D activities has been developed and approved. An auditable safety analysis (ASA) is not required based upon this facility categorization. A memorandum discussing the process used to determine the facility categorization and the required documentation was issued on 8/1/97.

Minimum Core Element Requirement: *A routine and emergency contingency plans program, including program records, has been established and implemented.*

Within the memorandum discussing the categorization of the facility a caveat was added to address discovery of higher levels of radiological contamination or chemicals. Radiological monitoring during D&D activities is currently planned and is addressed in the Building 123 HASP. Re-evaluation and re-categorization of the facility may be required based upon new data. RMRS Directive OPS-DIR-002, *Authorization Basis*, also addresses requirements of the project manager for issues when work deviates from the standard operating conditions of the facility or activity and an unanticipated hazard or condition develops.